IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

THE LUTHERAN CHURCH – MISSOURI	§
SYNOD, a Missouri nonprofit corporation	§
Plaintiff,	§
	§ Case No. 1:23-cv-1042-RP
v.	§ [Consolidated with 1:24-cv-00176-RP]
	§
DONALD CHRISTIAN, CHRISTOPHER	§
BANNWOLF, CONCORDIA	§
UNIVERSITY TEXAS, INC., & JOHN	§
DOES 1-12	§
Defendants	§

JOINT MOTION FOR CONFIDENTIALITY AND PROTECTIVE ORDER

Plaintiff, The Lutheran Church – Missouri Synod, a Missouri nonprofit corporation, and Defendants, Donald Christian, Christopher Bannwolf and Concordia University Texas, Inc. (hereinafter referred to as "Parties"), submit this Joint Motion for Confidentiality and Protective Order as follows:

1. This lawsuit involves certain documents and information that are sensitive and/or confidential that may be exchanged in discovery and/or submitted as evidence, including, but not limited to confidential employment and financial information. The parties request that the Court enter the attached Agreed Protective Order to protect legitimate privacy interests of the parties and the rights of third parties during the course of this litigation. The attached Agreed Protective Order is based on the form promulgated by the U.S. District Court for the Western District of Texas, but deleting Section 3b.¹

WHEREFORE, Plaintiff and Defendants pray that the Court sign and enter the Agreed Confidentiality and Protective Order attached hereto.

¹ https://www.txwd.uscourts.gov/main-forms/civil/index.html.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of August 2024, I electronically filed the above and foregoing document. I understand the CM/ECF system will send a Notice of Electronic Filing to all counsel of record.

/s/ Andrew MacRae
Andrew MacRae